



MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

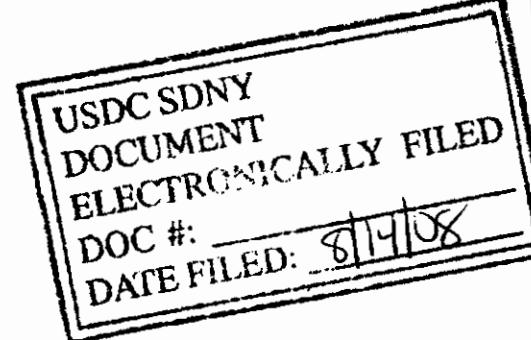
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August 12, 2008

BY FACSIMILE (212) 805-7941

Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007



Re: *Williams v. City of New York, et al.*, 08-CV-6075(LAP)(GWG)

Dear Judge Preska:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of this action on behalf of defendant City of New York. I am writing with the consent of plaintiff's counsel, David B. Bowman, Esq., to request a thirty-day enlargement of time, from August 14, 2008 to September 15, 2008¹, within which this office may answer or otherwise respond to the complaint. This is the City's first request for an enlargement of time in this action.

The plaintiff alleges, *inter alia*, violations of his constitutional rights under the Fourth and Fourteenth Amendments, when he was allegedly falsely arrested by police officers without any probable cause.

Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case and forward to the plaintiff for execution authorizations for the release of the underlying arrest and prosecution records, which may have been sealed pursuant to NYCPL § 160.50. Without the underlying records, defendants cannot properly

¹ September 14, 2008 is a Sunday.

assess this case or respond to the complaint. Accordingly, the enlargement of time will afford us the opportunity to fully investigate the matter and to secure the relevant documents.

In view of the foregoing, it is respectfully requested that the Court grant the within request extending the City's time to answer or otherwise respond to the complaint until September 15, 2008.

Thank you for your consideration of this matter.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

August 13, 2008

Respectfully submitted,

Hugh A. Zuber
Hugh A. Zuber (HZ 4935)
Assistant Corporation Counsel

BY FAX AND ELECTRONIC MAIL

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